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U. S. DEPARTMENT OF COMMERCE

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BUREAU OF STANDARDS

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CERTIFICATION PLAN SIGNIFICANCE AND SCOPE

*Its Application to
Federal Specifications and
Commercial Standards*

Miscellaneous Publication No. 105



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FOREWORD

An analysis of the status of the making and the utilization of specifications reveals the fact that many purchasing officers are using "specifications" which are such in name only, and that many excellent specifications well recognized throughout industry are not being widely used at the present time, attributable largely to the inability of most purchasers to determine whether or not commodities correspond to the specification requirements. A great impetus to the popularizing of the use and unification of real specifications could be given by eliminating this disadvantage to the small-quantity contract purchasers.

As a solution to the problem of minimizing the above-mentioned disadvantage and thereby facilitating the use of specifications, application is being made of the so-called "certification plan." This plan is being applied to several different groups of nationally recognized specifications. It is expected that it will prove of benefit not only in the general promotion of the use of specifications by both the small and the large consumers, but also in the unification of specifications having national recognition.

CERTIFICATION PLAN

SIGNIFICANCE AND SCOPE

Its Application to Federal Specifications and Commercial Standards

THE PLAN

The so-called "certification plan" involves the compilation and distribution of lists of manufacturers desirous of obtaining contracts based upon certain selected nationally recognized specifications, and willing, when requested to do so, to certify to the purchaser that the commodities delivered are guaranteed to comply with the requirements and tests of the specifications.

AIMS AND OBJECTS

(a) To make thoroughly effective the benefits to be derived by producers and consumers from the well-known economies incident to mass production, mass distribution, and mass consumption.

(b) To encourage the producers to manufacture staple commodities to comply with nationally recognized commodity specifications.

(c) To assist the producers in expanding their markets for staple commodities complying with nationally recognized specifications.

(d) To facilitate and expand the use of nationally recognized commodity specifications by large-quantity and medium-quantity buyers.

(e) To determine the commercial acceptability of certain nationally recognized specifications.

(f) To aid in unifying the specifications used throughout the country.

(g) To broaden the source of supply of products conforming to nationally recognized specifications.

FACILITATING THE USE OF SPECIFICATIONS

In supplying purchasers with lists of manufacturers willing to guarantee compliance with nationally recognized specifications, thereby overcoming certain disadvantages incident to the use of specifications by the medium-quantity buyer, and facilitating the use of specifications by contract purchasers, both

large and small, a great impetus is given to the popularizing of the use of specifications. Such benefits as are derived from the use of specifications by large consumers become available in full measure to the smaller consumer, with incidental advantage to the larger consumer of convenience in ordering and accepting commodities and of lessening of the price by reason of the broadening of the field of supply. Moreover, to the extent that the plan becomes effective throughout industry the manufacturers benefit from the well-known economies accompanying "mass production."

VOLUNTARY USE OF SPECIFICATIONS

Any method which will facilitate the general use of specifications by agencies not now using specifications, or making only a limited use of them, tends to increase the use of specifications, but so long as such use remains voluntary and the specification method of buying can be abandoned if found unsatisfactory, the facilitating method may not be classified as "forcing" the use of specifications. The pressure of economics and the inherent merit in the specifications result in the spread of specification buying, but "force" is not the correct term to use in this connection. The compilation and distribution of lists of manufacturers willing to certify to compliance with certain specifications are of interest not only to the purchasers who desire to base their contracts on these specifications, but also to producers who desire to supply commodities on contracts based on them.

ATTITUDE OF CONSUMER GROUPS

Without exception organized consumer groups are definitely in favor of the application of the certification plan for facilitating the use of specifications, as shown by statements from the officers of these groups. Included among these, in addition to the Federal agencies, are the American Hospital Association, American Sanatorium Association, Educational Buyers Association, the Governmental Purchasers Group, International City Managers Association, National Association of Public School Business Officials, the National Association of Purchasing Agents, the National Education Association, the National Municipal League, and the National Tuberculosis Association. It is not an exaggeration to state that the certification plan for facilitating the use of specifications is fully approved by governmental and institutional purchasers, Federal, State, county, and municipal.

ATTITUDE OF THOSE OPPOSED TO SPECIFICATIONS

It is not to be assumed that all manufacturers are enthusiastically advocating specifications. However, many manufacturers have expressed their approval of the application of the certification plan to nationally recognized specifications formulated under the auspices of, or with the cooperation of, associations in which they hold membership, even though some of these manufacturers would prefer their customers not to order on specifications. In other words, they consider it better to have the various isolated specification users make use of commercially acceptable specifications than to have them write their own specifications. To the extent that the certification plan will be effective in unifying the specifications used by those who will in any event buy on specifications, these manufacturers approve of the plan as tending to "minimize the evils of specification buying."

ATTITUDE OF TRADE ASSOCIATIONS AND TECHNICAL SOCIETIES

Correspondence conducted with the officers of technical societies and trade associations showed that all technical societies familiar with the formulation of specifications look with favor upon the certification plan as an effective method of bringing specifications to the attention of the interested producers and consumers. With surprisingly few exceptions, the officers of trade associations (many of whom might have been assumed to be opposed to the plan, at least initially) are actually very favorably inclined toward it.

RESULTING ECONOMIES

Considerable economy to the country as a whole would result from abolishing the hit-or-miss method of specifying, hit-or-miss method of manufacturing, and hit-or-miss method of testing, and substituting therefor a logical arrangement in accordance with which (1) a nationally recognized specification for a selected commodity is so formulated as to cover the most satisfactory commodity in the best possible manner; (2) this commodity is placed in mass production by the manufacturers in accordance with this specification; (3) certificates are issued by the suppliers guaranteeing compliance with this specification; and (4) tests and inspections, based on this identical specification, are conducted by independent testing and guaranteeing establishments.

BENEFITS TO SMALL AND LARGE PRODUCERS

To whatever extent the certification plan can be made effective throughout an industry all manufacturers will benefit from the well-known economies

accompanying "mass production." To the small producer, the merchandising benefits are self-evident, in giving him the opportunity to obtain contracts without excessive sales effort. To the large producer, the benefits are no less real in permitting him to minimize the expense involved in sales-promotion work among contract buyers. An analysis of the lists of willing-to-certify manufacturers already compiled shows that they contain the names of many progressive, wide-awake firms, irrespective of size, in all lines of manufacture covered by the specifications to which the certification plan has been applied.

BENEFITS TO DISTRIBUTORS

To the manufacturer, the jobber or retailer is a consumer; to the final buyer, he is equivalent to the producer or his agent. The certification plan would affect jobbers and retail merchants much more largely as buyers than as sellers; they would be affected directly as buyers and only indirectly as sellers. Such benefits as are derived by contract buyers from the certification plan are immediately available to the jobbers and retailers.

NEED FOR TESTING SERVICE

A greatly increased realization of the need for testing service by both producers and consumers is to be anticipated from the widespread application of the certification plan. Manufacturers will be in need of testing and inspection service upon which to base such certificates as they may be asked to issue to consumers buying upon nationally recognized specifications, and numerous consumers will resort to such tests as may be considered necessary or desirable to satisfy themselves that the commodities delivered do actually comply with the specifications.

ECONOMY IN TESTING

Assume the existence, at the present time, of a limited few manufacturers of a certain group of commodities supplied to say 1,000 consumers, each having his own specifications and making his own acceptance tests. As a substitute therefor, let there be set up a single set of specifications for this group of commodities mutually satisfactory to the manufacturers and the consumers. Let the manufacturers be thoroughly equipped with testing apparatus (a few sets of such apparatus will be needed instead of 1,000) to insure that the commodities made by them actually comply with the specifications, and let a few well-recognized independent testing establishments be utilized by the 1,000 consumers to check the deliveries under the specifications. Considerable economy to the country as a whole would result from making the above-

noted changes in the prevailing methods of specifying, manufacturing, testing, and accepting commodities.

MISREPRESENTATION IN CERTIFICATION

Misrepresentation in connection with the certification plan is the equivalent of "obtaining money under false pretenses." It might be a proper subject for Federal Trade Commission action, but doubtless nongovernmental agencies for accomplishing the same result would be even better. It is unnecessary for the Federal Government, or any governmental agency, to police the contracts entered into by buyers and sellers of commodities guaranteed to comply with certain specifications. The existing laws of the land relating to contracts are adequate to take care of all such cases. Misrepresentation means obtaining, by false representation, business which rightly belongs to a competitor. Hence, the competitors collectively are more vitally interested in the unethical practices of a manufacturer than is the isolated purchaser. By cooperating in the certification plan trade associations, inspection bureaus, testing establishments, and similar organizations can render a real service to both the producers and the consumers.

COOPERATION OF INDUSTRY

There are several ways in which industry, through representative trade associations, can become very active in the certification plan for facilitating the use of nationally recognized specifications.

(a) First of all is publicity, by means of which the industry will be made acquainted with the real significance of the undertaking and shown the benefits to be derived from the plan.

(b) Second, but of no less importance than the first, is thorough cooperation in the preparation of specifications that can most properly be referred to as nationally recognized.

(c) Next is cooperation in the plan by inducing all of the members of the association to have their names included in the list of manufacturers willing to certify to the purchaser that the commodities supplied by them under nationally recognized specifications comply with the requirements and tests of these specifications.

(d) Trade associations representing wholesalers, retailers, or manufacturers reaching consumers through retailers, can be of much help in showing the wholesalers and retailers how they (as both purchasers and sellers) will benefit from the plan.

(e) A final step for the trade association to take, when the time seems ripe for it to do so, is to make sure that its members are keeping faith so far as the certification is concerned.

TRADE ASSOCIATION ACTIVITIES

Among the agencies that are now engaged in, or have definitely planned for, activities tending to bring about a change from the present illogical to logical methods of formulating specifications, manufacturing in conformity therewith, and testing to insure or guarantee compliance, are the following:

1. American Chemical Society.
2. American Corn Millers Federation.
3. American Gas Association.
4. American Institute of Steel Construction.
5. American Medical Association.
6. American Petroleum Institute.
7. American Railway Association, freight container bureau.
8. American Sanatorium Association.
9. American Society of Agricultural Engineers.
10. American Society of Heating and Ventilating Engineers.
11. American Society of Mechanical Engineers.
12. American Society for Testing Materials.
13. Arkansas Soft Pine Bureau.
14. Asphalt Shingle and Roofing Institute.
15. Associated Cooperage Industries of America.
16. Associated Factory Mutual Fire Insurance Companies.
17. Associated General Contractors of America.
18. Associated Knit Underwear Manufacturers.
19. Associated Thermometer Manufacturers.
20. Associated Tile Manufacturers.
21. Association of American Wood Pulp Importers.
22. Association of Feed Control Officials.
23. Association of Manufacturers of Chilled Car Wheels.
24. Association of Official Agricultural Chemists (enforced by the Agricultural Department).
25. Better Bedding Alliance of America.
26. Bureau of Explosives.
27. California Redwood Association.
28. Canners' League of California.
29. Certified Milk Producers Association of America.
30. Commission on Standardization of Biological Stains.
31. Concrete Products Association.
32. Converters' Association.
33. Eastern Clay Products Association.
34. Fire Equipment Institute.
35. General Supply Committee, Treasury Department (list of successful bidders).
36. Glass Container Association.
37. Glycerine Producers' Association.
38. Grain Dealers National Association (polices its members under United States standard grain grading).
39. Hardwood Interior Trim Manufacturers Association.
40. Hardwood Manufacturers Institute.
41. Heating and Piping Contractors National Association.
42. Hickory Handle Association.
43. Hollow Building Tile Association.
44. International Association of Garment Manufacturers.
45. International Society of Master Painters and Decorators.
46. Interstate Cotton Seed Crushers Association.
47. Iron Research Institute.
48. Laundryowners National Association.
49. Malleable Iron Research Institute.
50. Maple Flooring Manufacturers Association.
51. National Association of Dyers and Cleaners of United States and Canada.
52. National Association of Finishers of Cotton Fabrics.
53. National Association of Musical Instruments and Accessories Manufacturers.
54. National Association of Real Estate Boards.
55. National Association of Shirt Manufacturers.
56. National Board of Fire Underwriters.
57. National Builders Supply Association.
58. National Canners Association.
59. National Confectioners Association.

60. National Fertilizer Association.
61. National Hardwood Lumber Association.
62. National Hay Association.
63. National Lumber Manufacturers Association.
64. National Macaroni Manufacturers Association.
65. National Pickle Packers' Association.
66. National Preservers' Association.
67. National Retail Lumber Dealers Association.
68. National Sand and Gravel Association.
69. Northern Hemlock and Hardwood Manufacturers Association.
70. Northern Pine Manufacturers Association.
71. Northern White Cedar Association.
72. Paperboard Industries Association.
73. Periodicals (such as Good Housekeeping, Modern Priscilla, and Popular Science Monthly) issue certificates of approval for trade-brand articles.
74. Pine Institute of America.
75. Pipe Nipple Standards Corporation.
76. Porcelain Plumbing Fixture Manufacturers.
77. Portland Cement Association.
78. Rice Millers' Association.
79. Sheet Steel Trade Extension Committee.
80. Society of Automotive Engineers.
81. Society for Electrical Development.
82. Southern Pine Association (grading under American standards).
83. Steamboat Inspection Service, of the Department of Commerce.
84. Steel Barrel Manufacturers Institute (I. C. C. specifications).
85. Tire and Rim Association of America.
86. Tissue Paper Manufacturers' Association.
87. Vitreous China Plumbing Fixture Manufacturers.
88. Wall Paper Manufacturers' Association of the United States.
89. West Coast Lumbermen's Association.
90. Western Pine Manufacturers Association.

RESULT OF WIDESPREAD APPLICATION OF PLAN

Not all of the nationally recognized specifications to which the certification plan might be applied are in complete harmony one with the other. However, in many cases the conflicts are more seeming than real, in that commodities that could be certified as complying with certain of these specifications would be accepted as complying with certain other specifications differing therefrom in some details. In any event, no new confusion would be created by having firms now accepting orders based upon conflicting specifications certify that the commodities delivered do actually comply therewith. In fact, the application of the certification plan to several groups of nationally recognized specifications will serve to draw attention to the present confusion and arouse an interest in a greater uniformity of standards. The result to be expected from a widespread application of the certification plan is a general recognition of specifications as the proper, logical, and economical basis of the written contract between the buyer and the seller.

LAUNCHING THE PLAN

Before the certification plan was placed in operation an outline thereof was submitted for the criticisms of the members of an advisory board organized for the purpose of cooperating with the Department of Commerce in solving some of the problems

of the Federal, State, and municipal agencies expending tax money in making their purchases, and consisting of official representatives of 14 leading national organizations interested in the preparation and unification of specifications. The replies from the board members were quite encouraging, and they were very helpful in calling attention to methods of avoiding certain well-known difficulties. Outlines of the plan were then submitted to about 500 public purchasers (those using tax money) throughout the United States and to about 500 officers of technical societies and trade associations having national recognition. The replies showed that the plan would be fully indorsed by the consumer organizations, and that the only opposition to the plan itself (as distinguished from certain specifications or groups of specifications to which it might be applied) would come from such organizations as are not truly in favor of really effective standardization.

INDORSEMENT BY FEDERAL AGENCIES

Approval of the certification plan in principle has been given by the Federal Purchasing Board. The details involved in compiling the lists of manufacturers willing to certify to compliance with Federal specifications (United States Government master specifications) were worked out in full accord with the ideas expressed by the Director of the Bureau of the Budget, and the lists are being distributed to all Federal Government departments and establishments at the suggestion of the Chief Coordinator.

APPLICATION TO FEDERAL SPECIFICATIONS

Among the duties assigned to the Federal Specifications Board are not only the compilation and adoption of standard specifications for materials and services, but also the bringing of the Government specifications into harmony with the best commercial practice whenever conditions permit, bearing in mind the broadening of the field of supply. Encouraging the maximum possible number of purchasing agents to make use of the specifications of the Federal Specifications Board would broaden the field of supply by inducing the maximum possible number of producers to manufacture commodities meeting the requirements of the Federal Government. Moreover, the widespread use of the Federal specifications would serve to draw attention to such modifications as might well be made therein in order to render them satisfactory to contract buyers, and to bring them into harmony with the best commercial practice. Every effort is being exerted to make the certification plan as effective as possible for "public pur-

chasers" (that is, governmental and institutional agencies, Federal, State, and municipal, who are spending the money collected from the public in the form of taxes) in conformance with the wishes of these agencies as expressed on numerous occasions.

SIGNIFICANCE AND STATUS OF FEDERAL SPECIFICATIONS

In formulating specifications for the United States Government, the Federal Specifications Board acts for the Government departments as consumers, not as law makers, and no specification is promulgated until after all interested producers have had abundant opportunity to offer constructive criticisms. To as great an extent as practicable the Federal Government as a consumer makes use in its specifications of the requirements set forth in the specifications of nationally recognized organizations. The controlling policy of the board in this respect is shown by a letter addressed by the chairman of the Federal Specifications Board to the chairmen of all technical committees of the board on December 1, 1924:

If there is an existing specification which is adequate for the Government requirement, it is desired that such specification be adopted, rather than to write a new specification with slight, unnecessary variations, which might require special fabrication with the resulting unnecessary increased costs.

Special effort is made continuously to bring the specifications of the Federal Specifications Board into harmony with the best commercial practice, and no method for doing this more effectively and rapidly than the certification plan has yet been developed.

OBLIGATIONS TO PRODUCERS AND CONSUMERS

While safeguarding the interests of the Federal Government as a purchaser, the certification plan also conserves the interests of the producers. It is being so applied as (1) to bring the United States Government master specifications to the attention of all interested responsible manufacturers throughout the United States and not merely to the attention of a favored few; (2) to list as sources of supply of commodities covered by these specifications all responsible manufacturers who have expressed their desire to be listed, even though some other manufacturers may not care to be listed, and notwithstanding the opposition of certain manufacturers who can obtain business satisfactory to them without being listed; (3) to distribute copies of the lists of "sources of supply" to all governmental and institutional buyers making purchases out of tax money; (4) to supply copies to nongovernmental purchasers when specifically requested to do so.

SELECTION OF SPECIFICATIONS

Only such Federal specifications as are believed by the committees responsible for the preparation and revision of the specifications to be thoroughly satisfactory to both producers and consumers in their present form are selected in applying the certification plan. Formal consideration has been given by the Federal Specifications Board to the method of selecting the specifications. The board expressed the opinion that the specifications should have been in actual use for at least one year before they are included in the "certification plan"; that in some cases, for example, those not "seasoned" by use, a longer period may be required, and that the chairman of the Federal Specifications Board technical committee concerned is the most competent person to judge in such cases.

The board expressed the opinion that it is highly desirable that the chairman of the respective committees be given reasonable notice (say 60 days) before putting any of the Federal specifications on "certification," so that any desirable revisions may be adopted prior to "certification." Before placing any of the Federal specifications in final form for promulgation by the board for the mandatory use of the Government departments and establishments, all criticisms of the specifications and advice received from interested commercial and industrial concerns are given serious consideration by the technical committees. Moreover, the specifications in tentative form are submitted formally to all departments and establishments of the Government and informally for criticism and suggestion to various interested engineering and technical societies through the American Standards Association. Thus the selection is limited to "seasoned" specifications, believed to be commercially satisfactory.

DISTINCTION BETWEEN FEDERAL SPECIFICATIONS AND COMMERCIAL STANDARDS

To certain Federal agencies has been assigned the duty of formulating and maintaining United States Government specifications in harmony with good commercial practice to broaden the field of supply of commodities covered by these specifications, which are, therefore, of much interest to producers who desire to supply commodities on contracts based on them and to purchasers who desire to base their contracts thereon. No producer is asked to confine his transactions to those commodities. Their use by nongovernmental agencies is entirely voluntary.

Commercial standards, on the other hand, are set up by industry itself as the basis for trade throughout the industry as a whole, including producers, distributors, and consumers, both contract

and over-the-counter, and the manufacturers, dealers, and users are asked to limit their transactions to those lines of commodities so far as they can conveniently do so.

COMPILATION OF WILLING-TO-CERTIFY LISTS

To all known manufacturers of the general line of commodities covered by the selected specifications, or group of specifications, is sent a check list of the particular kinds of commodities called for by the specifications. From the complete list of firms (which can be found in several directories) are omitted such manufacturers as do not indicate on the check lists that they build the exact kinds of commodities referred to, and from the smaller list are then omitted those manufacturers who do not desire to build commodities in accordance with the designated specification, and from the still smaller list are omitted such firms as have not expressed their willingness to certify to the purchaser, upon request, that the commodities delivered under a contract based on the designated specification do actually comply therewith.

VOLUNTARY LISTING

Great care is used to make as nearly complete as possible the initial lists of firms manufacturing commodities of the same general type as that covered by a specification to which the certification plan is being applied, and extreme care is exerted to have the final "willing-to-certify" listing entirely voluntary. Follow-up letters are sent in connection with the initial but not the final listing. No attempt has been made to induce manufacturers, not desiring to do so, to be listed as willing to certify, and no special attempt has been made to obtain official indorsement of the certification plan by any trade association. However, the executive officers of the Asphalt Shingle and Roofing Association, the Gypsum Industries, and the Leather Belting Exchange, upon their own initiative, took definite steps to make sure that the name of every member of their organizations appeared on the willing-to-certify lists, and the secretary of the National Industrial Council (a federation of National, State, and local associations organized under the leadership of the National Association of Manufacturers to foster constructive industrial legislation and to oppose the enactment of class laws) has stated that the certification plan is "one of the most effective media for combating questionable or unethical merchandising and production practices ever conceived." He continued: "Its strictly voluntary character in my opinion is one of the most constructive works any branch of the Government is carrying on; and it is

bound to be a million times more effective than all of the legislative dictums or panaceas, such as indigestible truth-in-fabrics laws, could or would accomplish."

APPLICATION TO FEDERAL SPECIFICATIONS

There have been compiled by the National Bureau of Standards 267 lists of such firms as have expressed to the bureau their desire to have their names placed on the lists of manufacturers, willing, when requested to do so, to certify to purchasers that material supplied in accordance with the designated 267 Federal specifications complies with the requirements and tests of these specifications, and is so guaranteed by them. These lists represent more than 7,500 requests for listing from about 2,000 firms.

The groups of commodities covered by the specifications to which the certification plan has been applied, the number of Federal specifications in each group, the number of requests for listing, and the number of firms requesting listing in each group, are shown in the accompanying table.

Statistical summary of willing-to-certify lists as applied to Federal specifications

Commodity groups	Total number of—		
	Specifi- cations	List- ings	Firms
Abrasives and polishing materials.....	9	108	50
Brushes and brooms.....	48	944	168
Builders' hardware.....	1	33	33
Cement, Portland.....	1	68	68
Electrical supplies.....	11	176	139
Fire extinguishers and liquids.....	3	78	49
Glass.....	1	59	59
Heat-insulating materials.....	8	58	30
Inks.....	7	126	47
Leather goods.....	4	106	73
Lime and plaster.....	4	149	86
Linoleum.....	2	10	5
Liquid-measuring devices.....	1	21	21
Packing and gaskets.....	13	162	70
Padlocks.....	1	17	17
Paints and paint materials.....	30	3,004	305
Paper.....	29	459	96
Pipe and pipe fittings.....	7	86	60
Refractories.....	3	107	57
Ribbons, typewriter.....	3	94	36
Road and paving materials.....	7	123	45
Roofing, bituminous, and waterproofing..	16	571	105
Rope, wire.....	1	15	15
Safes, burglar-resisting.....	1	3	3
Scales, railroad track.....	1	7	7
Screws, wood.....	1	13	13
Soaps and scouring compounds.....	13	563	149
Tableware, silver-plated.....	1	7	7
Textiles.....	36	598	207
Tubing, metallic.....	4	61	49
Total.....	267	7,826	2,074

APPLICATION TO COMMERCIAL STANDARDS

The certification plan has also been applied to 7 commercial standards, 125 firms having expressed their desire for 159 listings among the willing-to-certify manufacturers of the commodities covered by commercial standards for clinical thermometers; Stoddard solvent; staple porcelain all-clay plumbing fixtures; brass, steel, and wrought-iron pipe nipples; and regain of mercerized cotton yarns. Application of the plan to the above-noted commercial standards has been made in accordance with the formal request of the general conferences of industry which adopted the standards referred to. Similar formal requests have been made by general conferences relating to commercial standards for surgical gauze; standard weight malleable iron or steel screwed unions; plain and thread plug limit gage blanks; builders' template hardware; dress patterns; boys' blouses, waists, shirts, and junior shirts; men's pajamas; wall paper; and diamond core drill fittings.

CIRCULATION OF WILLING-TO-CERTIFY LISTS

The lists of manufacturers willing to certify to compliance with certain selected Federal specifications are contained in a Bureau of Standards Letter Circular No. 256 entitled "Sources of Supply of Commodities Covered by United States Government Master Specifications." This circular is not published; its distribution is limited to governmental and institutional purchasers, Federal, State, county, and municipal. In slightly modified form it is sent to others only upon specific request, or to officers of interested associations and societies for comment and criticism.

The lists of manufacturers willing to certify to compliance with commercial standards which have been established by the various industries as the basis for trade throughout the industry as a whole are given the widest possible distribution, use being made of every available channel for such distribution.











